

EXHIBIT 128

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

STATES OF NEW YORK,
MASSACHUSETTS,
WASHINGTON, COLORADO,
CONNECTICUT, DELAWARE,
DISTRICT OF COLUMBIA,
HAWAII, ILLINOIS, IOWA, NEW
MEXICO, NORTH CAROLINA,
OREGON, PENNSYLVANIA,
RHODE ISLAND, VERMONT, and
VIRGINIA,

Plaintiffs,

v.

DONALD TRUMP, in his official
capacity as President of the United
States; U.S. DEPARTMENT OF
HOMELAND SECURITY; ELAINE
C. DUKE, in her official capacity; U.S.
CITIZENSHIP AND IMMIGRATION
SERVICES; U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
and the UNITED STATES OF
AMERICA,

Defendants.

CIVIL ACTION NO. 1:17-cv-05228
(NGG) (JO)

**UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF NEW YORK
NO. 17-CV-5228
STATE OF NEW YORK, ET AL. V. DONALD TRUMP, ET AL.**

DECLARATION OF JONATHAN WOMER

1. My name is Jonathan Womer, and I serve as the Director of the Rhode Island Office of Management and Budget.
2. The Office of Management and Budget provides credible, accurate financial information to the Governor, General Assembly and State Departments and Agencies. More information about the Office can be found at www.omb.ri.gov.
3. As explained more fully in the attached chart (Exhibit A) the rescission of DACA could have significant impacts on Rhode Island's economy. Specifically, studies suggest that removing DACA protections could lead to over \$1,000,000.00 (One million dollars) in lost state and local income, real estate and vehicle taxes.
4. Other studies indicate that DACA has led to improved labor market outcomes and, therefore, higher wages for workers; and that DACA generates positive public health externalities that reduce state expenditures on healthcare.



JONATHAN WOMER

Director, Rhode Island Office of Management and Budget

Dated: September 26, 2017

EXHIBIT A

Impact	Key Findings	Additional Details
State and Local Tax Revenue	<i>Rescinding DACA protections could lead to over \$1 million in lost state and local tax revenue.</i>	<p>A 2017 study from the Institute on Taxation and Economic Policy finds that rescinding DACA protections would decrease tax contributions from eligible Rhode Island residents by 33%, or \$1,240,000.¹</p> <p>A 2017 national survey conducted by the National Immigration Law Center and the Center for American Progress reports that DACA participants engage in significant taxable transactions. For example:</p> <ul style="list-style-type: none"> • 23.5% of DACA participants over 25 years old purchased their first home after their DACA application was approved.² • 64.5% of DACA participants bought their first car after their DACA application was approved.³
Workforce Development	<i>DACA participation leads to higher wages and may lead to improved labor market outcomes for participants.</i>	<p>A 2017 study from the Institute on Taxation and Economic Policy finds that granting DACA status “increases wages by 8.5%, according to a 2014 report by the Center for American Progress.”⁴</p> <p>A 2017 national survey conducted by the National Immigration Law Center and the Center for American Progress reports that of participants over the age of 25, after their DACA applications were approved:⁵</p> <ul style="list-style-type: none"> • 93.3% were currently employed, • 35.3% got their first job, • 77.7% got jobs with better pay, and • 66.9% got jobs with health insurance or other benefits. <p>In addition, DACA participants who attended college may have difficulty paying their student loans due to difficulty in gaining employment.</p>
Public Health	<i>DACA may generate positive public health externalities that reduce state expenditures on healthcare.</i>	<ul style="list-style-type: none"> • Access to private health insurance reduces state expenditures by decreasing hospital visits that qualify for Emergency Medicaid. • A 2017 study of Medicaid claims published in <i>Science</i> found that “mother’s DACA eligibility reduced adjustment and anxiety disorder diagnoses in their children by 4.3 percentage points from a baseline rate of 7.9%...This represents more than a 50% drop in the rate of these disorders.”⁶

¹ Hill, Misha E., and Meg Wiehe. "State & Local Tax Contributions of Young Undocumented Immigrants." Institute on Taxation and Economic Policy, April 2017. Appendix A: "State and Local Tax Contributions of DACA-eligible Individuals" <https://itep.org/wp-content/uploads/2017DACA.pdf>

² Wong, Tom K. "Results from Tom K. Wong et al., 2017 National DACA Study." August 27, 2017. Page 3. <https://cdn.americanprogress.org/content/uploads/2017/08/27164928/Wong-Et-Al-New-DACA-Survey-2017-Codebook.pdf>.

³ Wong, Tom K. "Results from Tom K. Wong et al., 2017 National DACA Study." August 27, 2017. Page 3. <https://cdn.americanprogress.org/content/uploads/2017/08/27164928/Wong-Et-Al-New-DACA-Survey-2017-Codebook.pdf>.

⁴ Hill, Misha E., and Meg Wiehe. "State & Local Tax Contributions of Young Undocumented Immigrants." Institute on Taxation and Economic Policy, April 2017. Page 6. <https://itep.org/wp-content/uploads/2017DACA.pdf>

⁵ Wong, Tom K. "Results from Tom K. Wong et al., 2017 National DACA Study." August 27, 2017. Page 3. <https://cdn.americanprogress.org/content/uploads/2017/08/27164928/Wong-Et-Al-New-DACA-Survey-2017-Codebook.pdf>

⁶ Hainmueller, Jens, Duncan Lawrence, Linna Martén, Bernard Black, Lucila Figueroa, Michael Hotard, Tomás Jiménez, Fernando Mendoza, Maria J. Rodriguez, Jonas Swartz, and David Laitin. "Protecting unauthorized immigrant mothers improves their children’s mental health." *Science*, 1044th ser., no. 1041 (September 08, 2017). Page 3.